VIA FIRST CLASS MAIL AND EMAIL TO: kane.eleanor@epa.gov

Attn: Compliance Tracker, EE17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Re: Madison-Kipp Corporation

Dear Ms. Kane:

This letter and the enclosed stack test reports are provided as a response to the "Request to Provide Information Pursuant to the Clean Air Act" (the "Request"), submitted by the United States Environmental Protection Agency ("EPA") to Madison-Kipp Corporation ("Madison-Kipp"). By email dated March 11, 2014, Madison-Kipp received a modification to the due dates in the Request and this submittal is being timely submitted pursuant to those modified deadlines.

The final reports for the stack testing performed at the Madison-Kipp-North Plant and South Plant are enclosed and have been assigned Bates Nos. MKC00001 through MKC00188. This testing was performed in accordance with protocols that were approved by EPA.

The stack test results show particulate matter emissions are less than eight times permitted limits for the South Plant and less than five times permitted limits for the North Plant. Using the new emission factors, calculated emissions for both chlorine and hydrogen chloride show that Madison Kipp is operating well within the allowable limits in permit condition I.A(3)(b)(3) and I.A.(4)(a)(2).

The stack test report for the South Plant shows an increase of chlorine compared to previous stack tests. A comparison of hydrogen chloride and chlorine gas emissions from the 2001 stack test and the 2014 stack test, both with a chlorine injection rate of 30 pounds per hour, shows that hydrogen chloride emissions decreased on a pound per hour basis while chlorine gas emissions increased. The formation of hydrogen chloride versus the emissions of chlorine gas may be influenced by multiple factors within the exhaust gas environment, so it is difficult to draw a clear conclusion from these numbers. However, a comparison of total chloride emission shows that independent of the form of the emissions (either hydrogen chloride or chlorine gas), the total amount of chloride emissions have decreased from the 2001 stack test to the 2014 stack test.

Chloride Emissions Stack Test Comparison

	HCl	Cl_2	Total Chloride
2014 Stack Test (lb/hr)	2.43	2.02	4.38
2001 Stack Test (lb/hr)	5.474	0.177	5.50

Please feel free to contact me with respect to this submittal.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information (*i.e.*, the stack testing firm), I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(C)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

AlinaWalcek

Alina Walcek
Madison-Kipp Corporation

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